

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LAYNE DREXEL,	:	
	:	
Plaintiff,	:	
	:	C.A. No. 05-00428 (JJF)
v.	:	
	:	Jury Trial Demanded
HARLEYSVILLE INSURANCE CO.,	:	
	:	
Defendant.	:	

Plaintiff's Local Rule 51.1(c) Proposed Special Verdict Form

1. Do you find that Layne Drexel and Harleysville Mutual Insurance Company entered into an insurance contract covering the dates June 8, 2004 and June 3, 2005?

☐ Yes ☐ No

* If your answer is "Yes," please proceed to question 3. If your answer is "No," please proceed to question 2.

2. Do you find that Harleysville, because of its actions following the fire, should be estopped from denying the existence of an insurance policy which was effective on the date of the fire?

☐ Yes ☐ No

* If your answer is "Yes," please proceed to question 3. If your answer is "No," please proceed to question 5.

3. Do you find that Harleysville Mutual Insurance Company has breached the insurance contract with Layne Drexel?

☐ Yes ☐ No

* If your answer is "Yes," please stop and notify the bailiff that you are finished. If your answer is "No," please proceed to question 4.

5. Do you find that Harleysville should compensate plaintiff for the fire damages under the doctrine of Promissory Estoppel?

_____ Yes _____ No

* Once you have answered this question, please stop and notify the bailiff that you are finished.

SMITH, KATZENSTEIN & FURLOW LLP

/s/ Robert K. Beste

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January 31, 2008

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